

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

<b>DR. AMRA SABIC-EL-RAYESS,</b>  <i>Plaintiff,</i>  v.  <b>TEACHERS COLLEGE, COLUMBIA UNIVERSITY,</b>  <i>Defendant.</i>	<b>Case No. 1:24-cv-02891-JMF</b>
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**JOINT LETTER IN ANTICIPATION OF THE PARTIES' JANUARY 14, 2025 INITIAL  
PRETRIAL CONFERENCE**

Pursuant to this Court's December 5, 2024 Opinion and Order and in anticipation of the Initial Pretrial Conference scheduled to take place on January 14, 2025 at 9:00 a.m. (ECF No. 38) at 17), Plaintiff Dr. Amra Sabic-El-Rayess ("Plaintiff") and Defendant Teachers College, Columbia University ("Defendant") (collectively, "the Parties") hereby submit this Joint Letter.

**I. STATEMENT ON NECESSITY OF AN INITIAL PRETRIAL CONFERENCE**

The Parties do not believe an Initial Pretrial Conference is necessary in this matter. If the Court nevertheless determines that an Initial Pretrial Conference should be held, then the Parties are available during the original scheduled time of Tuesday, January 14, 2025 at 9:00 a.m., as well as on Wednesday, January 15, 2025 from 10:00 a.m. to 2 p.m., and on Friday, January 17, 2025 from 10 a.m. to 11:30 a.m. and from 3:30 p.m. to 5 p.m.

**II. BRIEF STATEMENT ON NATURE OF THE ACTION AND DEFENSES**

In her Second Amended Complaint, Plaintiff alleged discrimination and retaliation claims against Defendant under the New York City Human Rights Law, Title VII of the Civil Rights Act of 1964, and the Age Discrimination in Employment Act of 1967. (Second Amended Complaint,

ECF No. 26, at ¶¶ 250–345.) After Plaintiff filed the Second Amended Complaint, the Court issued an order dismissing Plaintiff’s age discrimination claims. (ECF No. 38.) Plaintiff’s claims of religious discrimination and retaliation remain before the Court. Defendant denies that it is liable as to all of Plaintiff’s claims.

### **III. BRIEF EXPLANATION OF JURISDICTION AND VENUE**

This Court has subject-matter jurisdiction over this suit pursuant to 28 U.S.C. § 1331 because this action involves claims brought under Title VII of the Civil Rights Act of 1964 and the Age Discrimination in Employment Act of 1967. This Court has supplemental jurisdiction over Plaintiff’s claims under the New York City Human Rights Law pursuant to 28 U.S.C. § 1367. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(1)–(2) because Defendant resides in this District, Defendant conducts substantial business in this District, and a substantial part of the events or omissions giving rise to Plaintiff’s claims occurred in this District.

### **IV. STATEMENT OF EXISTING DEADLINES, DUE DATES, AND CUT-OFF DATES**

On December 18, 2024, Plaintiff filed a Motion for Leave to File a Third Amended Complaint. (ECF No. 39.) The deadline for Defendant to file its Opposition to Plaintiff’s Motion for Leave to File a Third Amended Complaint is currently set for January 10, 2025, and Plaintiff’s deadline to file a Reply in Support of her Motion for Leave to File a Third Amended Complaint is currently set for January 17, 2025. (ECF No. 42.) In the event that the Court ultimately denies Plaintiff’s Motion for Leave to File a Third Amended Complaint, then Defendant’s Answer to Plaintiff’s Second Amended Complaint is due within one week of the Court’s ruling on Plaintiff’s Motion for Leave to File a Third Amended Complaint. (ECF No. 45.)

**V. BRIEF DESCRIPTION OF ANY OUTSTANDING MOTIONS**

Plaintiff's Motion for Leave to File a Third Amended Complaint (ECF No. 39) is currently pending before this Court.

**VI. BRIEF DESCRIPTION OF DISCOVERY THAT HAS ALREADY TAKEN PLACE**

The Parties have exchanged documents and information pursuant to this Court's Initial Discovery Protocols for Employment Cases Alleging Adverse Action.

**VII. LIST OF PRIOR SETTLEMENT DISCUSSIONS**

The Parties have not engaged in settlement discussions during the pendency of this litigation.

**VIII. STATEMENT CONFIRMING THAT THE PARTIES HAVE DISCUSSED THE USE OF ALTERNATE DISPUTE RESOLUTION MECHANISMS**

The Parties have discussed the use of alternate dispute resolution mechanisms and do **not** presently believe that (a) a settlement conference before a Magistrate Judge; (b) participation in the District's Mediation Program; and/or (c) retention of a privately retained mediator would be appropriate.

**IX. OTHER INFORMATION THE PARTIES BELIEVE MAY ASSIST THE COURT IN ADVANCING THE CASE TO SETTLEMENT OR TRIAL**

At this time, there is no other information that the Parties believe may assist the Court in advancing the case to settlement or trial.

Dated: January 9, 2025

Respectfully submitted,

/s/ Alok Nadig

ALOK NADIG

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